



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

Lori F. Kaplan
Commissioner

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Mr. Allan Stegman
Engineered Polymer Solutions d/b/a Valspar Coatings
28335 Clay Street
Elkhart, Indiana 46517

Re: **039-15899**
First Significant Permit Modification to
Part 70 No.: T 039-7428-00147

Dear Mr. Stegman:

Engineered Polymer Solutions d/b/a Valspar Coatings was issued a permit on December 17, 1998 for a coating and paint manufacturing source. A letter requesting changes to this permit was received on April 22, 2002. Pursuant to the provisions of 326 IAC 2-7-12 a Significant Permit Modification to this permit is hereby approved as described in the attached Technical Support Document.

The modification limits the emissions of the worst case single HAP from the gelcoat mixing area (CF-1) to less than 9.5 tons per year, and limits the total HAPs emissions from CF-1 to less than 24.5 tons per year, in order to render the source a minor source of HAPs pursuant to 40 CFR 63.2.

The changes in the Part 70 Operating Permit are documented in the Technical Support Document. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Edward A. Longenberger, c/o OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, at 631-691-3395 ext. 20 or in Indiana at 1-800-451-6027 (ext 631-691-3395).

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
EAL/MES

cc: File - Elkhart County
U.S. EPA, Region V
Elkhart County Health Department
Northern Regional Office
Air Compliance Section Inspector - Paul Karkiewicz
Compliance Branch - Karen Nowak
Administrative and Development - Lisa Lawrence
Technical Support and Modeling - Michelle Boner



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PART 70 OPERATING PERMIT OFFICE OF AIR QUALITY

Engineered Polymer Solutions d/b/a Valspar Coatings 28335 Clay Street Elkhart, Indiana 46517

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T 039-7428-00147	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: December 17, 1998 Expiration Date: December 17, 2003

First Minor Permit Modification 039-12993-00147, issued April 12, 2001
First Reopening 039-13257-00147, issued January 15, 2002
First Administrative Amendment 039-15221-00147, issued February 7, 2002

First Significant Permit Modification No.: 039-15899-00147	Pages Affected: 5, 28, 29, 30, 31, 31a, 40, 41
Issued by: Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: December 2, 2002

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary coating/paint manufacturing operation.

Responsible Official:	Plant Manager
Source Address:	28335 Clay Street, Elkhart, Indiana 46517
Mailing Address:	28335 Clay Street, Elkhart, Indiana 46517
SIC Code:	2851
County Location:	Elkhart
County Status:	Maintenance for Ozone Attainment for all other criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) gelcoat mixing area, identified as CF1, with a maximum capacity of 1,600,000 gallons per year, using a baghouse as control, exhausting to one (1) stack (DC1), consisting of the following equipment:
 - (a) Three (3) mix tanks, with a maximum capacity of 1,100 gallons each;
 - (b) One (1) mix tank, with a maximum capacity of 2,400 gallons;
 - (c) Four (4) mix tanks, with a maximum capacity of 1,100 gallons each;
 - (d) Two (2) mix tanks, with a maximum capacity of 1,200 gallons each;
 - (e) One (1) mix tank, with a maximum capacity of 1,000 gallons;
 - (f) One (1) mix tank, with a maximum capacity of 2,400 gallons;
 - (g) Ten (10) portable tanks, with a maximum capacity of 55 gallons each;
 - (h) Two (2) portable tanks, with a maximum capacity of 110 gallons each;
 - (i) Seven (7) portable tanks, with a maximum capacity of 165 gallons each;
 - (j) Three (3) portable tanks, with a maximum capacity of 220 gallons each;
 - (k) Ten (10) portable tanks, with a maximum capacity of 330 gallons each;
 - (l) Six (6) portable tanks, with a maximum capacity of 440 gallons each;

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

- (1) One (1) gelcoat mixing area, identified as CF1, with a maximum capacity of 1,600,000 gallons per year, using a baghouse as control, exhausting to one (1) stack (DC1), consisting of the following equipment:
- (A) Three (3) mix tanks, with a maximum capacity of 1,100 gallons each;
 - (B) One (1) mix tank, with a maximum capacity of 2,400 gallons;
 - (C) Four (4) mix tanks, with a maximum capacity of 1,100 gallons each;
 - (D) Two (2) mix tanks, with a maximum capacity of 1,200 gallons each;
 - (E) One (1) mix tank, with a maximum capacity of 1,000 gallons;
 - (F) One (1) mix tank, with a maximum capacity of 2,400 gallons;
 - (G) Ten (10) portable tanks, with a maximum capacity of 55 gallons each;
 - (H) Two (2) portable tanks, with a maximum capacity of 110 gallons each;
 - (I) Seven (7) portable tanks, with a maximum capacity of 165 gallons each;
 - (J) Three (3) portable tanks, with a maximum capacity of 220 gallons each;
 - (K) Ten (10) portable tanks, with a maximum capacity of 330 gallons each;
 - (L) Six (6) portable tanks, with a maximum capacity of 440 gallons each;
 - (M) Ten (10) portable tanks, with a maximum capacity of 550 gallons each;
 - (N) Twelve (12) portable tanks, with a maximum capacity of 660 gallons each;
 - (O) One (1) soup tank;
 - (P) One (1) 5 horsepower lightning blender;
 - (Q) Three (3) Myers 4-stage hydraulic units (blenders);
 - (R) One (1) 15 horsepower Myers blender;
 - (S) One (1) 10 horsepower Myers blender;
 - (T) One (1) 125 horsepower two-speed disperser;
 - (U) Two (2) 30/60 horsepower two-speed dispersers with sweep arm;
 - (V) One (1) 100 horsepower two-speed disperser;
 - (W) One (1) 60 horsepower variable-speed disperser;
 - (X) One (1) 50 horsepower variable-speed disperser;
 - (Y) One (1) 35 horsepower variable-speed disperser;
 - (Z) One (1) 25 horsepower variable-speed disperser;
 - (AA) One (1) 50 horsepower variable-speed disperser;
 - (BB) One (1) 12-inch duct fan;
 - (CC) Two (2) dry filters; and
 - (DD) One (1) 3000 acfm fabric filter.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the gelcoat mixing area shall be limited by the following:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Interpolation and extrapolation of the data for the process weight rate in excess of 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 55.0 P^{0.11} - 40$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.1.2 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

The total number of gallons produced by the gelcoat mixing area shall be limited to 1,600,000 gallons per year. This will make the potential VOC emission less than 25 tons/year and 326 IAC 8-1-6 (General Reduction Requirements) not applicable. This limit was specified in Registration CP 039-2372, issued on November 2, 1995. The Registration (CP 039-2372) was issued as a result of an appeal to the original Construction Permit (CP 039-2372), issued on February 4, 1994. The Construction Permit (CP 039-2372) was superseded by Registration CP 039-2372

D.1.3 Hazardous Air Pollutants (HAPs) [40 CFR 63.2]

The emissions of any single HAP from the one (1) gelcoat mixing area, identified as CF1, shall be limited to less than 9.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, and the emissions of total HAPs from the one (1) gelcoat mixing area, identified as CF1, shall be limited to less than 24.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore, this source is a minor source of HAPs pursuant to 40 CFR 63.2.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter (PM) and volatile organic compound (VOC) limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation and production data supplied by the Permittee. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.6 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.7 HAPs Emissions

Compliance with Condition D.1.3 shall be determined by using the methodologies contained in the US EPA Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities, and shall be demonstrated at the end of each month based on the HAPs usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.8 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2, the baghouse for PM control shall be in operation at all times that the raw materials in the gelcoat mixing area that have the potential to release particulate emissions are being dispensed into the manufacturing equipment and exhausting to the outside atmosphere.

D.1.9 Visible Emissions Notations

- (a) Visible emission notations of the gelcoat mixing area stack exhaust shall be performed daily when the gelcoat mixing area has the potential to release particulate emissions, during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (c) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (d) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.10 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the gelcoat mixing area, at least once daily when the gelcoat mixing area is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.5 to 3.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.1.11 Broken Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.1.12 Monitoring

The permittee shall record the total number of gallons produced from the gelcoat mixing area each month to ensure compliance with Condition D.1.2.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.13 Record Keeping Requirements

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- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records of the total number of gallons produced from the gelcoat mixing area each month.
 - (b) To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAPs emission limits established in Condition D.1.3.
 - (1) The amount and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;
 - (2) The HAPs usage for each month;
 - (3) The calculations used to quantify HAPs emissions for each month, including all equations and assumptions. The Permittee shall calculate HAPs emissions using the US EPA Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities; and
 - (4) The weight of each HAP emitted for each compliance period.
 - (b) To document compliance with Condition D.1.9, the Permittee shall maintain records of daily visible emission notations of the gelcoat mixing area stack exhaust when the raw materials in the gelcoat mixing area that have potential particulate emissions are being dispensed into the process equipment.
 - (c) To document compliance with Condition D.1.10, the Permittee shall maintain records as to when the baghouse controlling the gelcoat mixing area is in operation and shall document the following:
 - (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all response steps implemented, per event.
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.

D.1.14 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2 and

Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Engineered Polymer Solutions d/b/a Valspar Coatings
Source Address: 28335 Clay Street, Elkhart, Indiana 46517
Mailing Address: 28335 Clay Street, Elkhart, Indiana 46517
Part 70 Permit No.: T 039-7428-00147
Facility: CF-1
Parameter: Worst case single HAP emissions
Limit: Less than 9.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

Month	Worst Case Single HAP Emissions (tons)	Worst Case Single HAP Emissions (tons)	Worst Case Single HAP Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on:

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Engineered Polymer Solutions d/b/a Valspar Coatings
Source Address: 28335 Clay Street, Elkhart, Indiana 46517
Mailing Address: 28335 Clay Street, Elkhart, Indiana 46517
Part 70 Permit No.: T 039-7428-00147
Facility: CF-1
Parameter: Total HAPs emissions
Limit: Less than 24.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

Month	Total HAPs Emissions (tons)	Total HAPs Emissions (tons)	Total HAPs Emissions (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management Office of Air Quality

Technical Support Document (TSD) for a Part 70 Significant Permit Modification

Source Background and Description

Source Name:	Engineered Polymer Solutions d/b/a Valspar Coatings
Source Location:	28335 Clay Street, Elkhart, Indiana 46517
County:	Elkhart
SIC Code:	2851
Operation Permit No.:	T 039-7428-00147
Operation Permit Issuance Date:	December 17, 1998
Significant Permit Modification No.:	SPM 039-15899-00147
Permit Reviewer:	Edward A. Longenberger

The Office of Air Quality (OAQ) has reviewed a modification application from Engineered Polymer Solutions d/b/a Valspar Coatings relating to the operation of a coating and paint manufacturing source.

History

Engineered Polymer Solutions d/b/a Valspar Coatings was issued a Part 70 permit on December 17, 1998. At that time, the company was named Lilly Industries. On April 22, 2002, Engineered Polymer Solutions d/b/a Valspar Coatings submitted an application to the OAQ requesting that the HAPs emissions from the source be limited to less than ten (10) tons per twelve (12) consecutive month period for any single HAP and less than twenty-five (25) tons per twelve (12) consecutive month period for combination HAPs. This limit will make the source a minor source of HAPs pursuant to 40 CFR 63.2.

Recommendation

The staff recommends to the Commissioner that the Part 70 Significant Permit Modification be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on April 22, 2002.

Justification for Modification

The Part 70 Operating permit is being modified through a Part 70 Significant Permit Modification. This modification is being performed pursuant to 326 IAC 2-7-12(d), because the permit modification establishes a Part 70 permit condition which renders the source a minor source of HAPs pursuant to 40 CFR 63.2, and involves significant changes to existing record keeping and reporting requirements.

Federal Rule Applicability

The emissions of the worst case single HAP from the gelcoat mixing area (CF-1) will be limited to less than 9.5 tons per year, and the total HAPs emissions from CF-1 will be limited to less than 24.5 tons per year. These limits, coupled with the total potential HAPs emissions from the existing two (2) spray paint booths of 0.35 tons per year, will ensure that this source is not a major source of HAPs pursuant to 40 CFR 63.2. Therefore, the requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source, because this source is not a major source of HAPs.

Proposed Changes

The permit language is changed to read as follows (deleted language appears as ~~strikeouts~~, new language appears in bold):

A.1 General Information ~~[326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]~~

The Permittee owns and operates a stationary coating/paint manufacturing operation.

Responsible Official: ~~Ken Kizer~~ **Plant Manager**
Source Address: 28335 Clay Street, Elkhart, Indiana 46517
Mailing Address: 28335 Clay Street, Elkhart, Indiana 46517
SIC Code: 2851
County Location: Elkhart
County Status: Maintenance for Ozone
Attainment for all other criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD Rules;
~~Major~~ **Minor** Source, Section 112 of the Clean Air Act

D.1.3 Hazardous Air Pollutants (HAPs) ~~[40 CFR 63.2]~~

The emissions of any single HAP from the one (1) gelcoat mixing area, identified as CF1, shall be limited to less than 9.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month, and the emissions of total HAPs from the one (1) gelcoat mixing area, identified as CF1, shall be limited to less than 24.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month. Therefore, this source is a minor source of HAPs pursuant to 40 CFR 63.2.

Compliance Determination Requirements

D.1.34 Testing Requirements ~~[326 IAC 2-7-6(1),(6)]~~

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the particulate matter (PM) and volatile organic compound (VOC) limits specified in Conditions D.1.1 and D.1.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.45 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Condition D.1.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation and production data supplied by the Permittee. IDEM, OAM reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.1.56 VOC Emissions

Compliance with Condition D.1.2 shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

D.1.7 HAPs Emissions

Compliance with Condition D.1.3 shall be determined by using the methodologies contained in the US EPA Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities, and shall be demonstrated at the end of each month based on the HAPs usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.68 Particulate Matter (PM)

Pursuant to 326 IAC 6-3-2, the baghouse for PM control shall be in operation at all times that the raw materials in the gelcoat mixing area that have the potential to release particulate emissions are being dispensed into the manufacturing equipment and exhausting to the outside atmosphere.

D.1.79 Visible Emissions Notations

- (a) Visible emission notations of the gelcoat mixing area stack exhaust shall be performed daily when the gelcoat mixing area has the potential to release particulate emissions, during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (c) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (d) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

D.1.810 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the gelcoat mixing area, at least once daily when the gelcoat mixing area is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 0.5 to 3.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge Specifications, of this permit, shall be subject to approval by IDEM, OAM, and shall be calibrated at least once every six (6) months.

D.1.911 Broken Bag Detection

In the event that bag failure has been observed:

- (a) The affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) hours of discovery of the failure and shall include a timetable for completion. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).
- (b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

D.1.102 Monitoring

The permittee shall record the total number of gallons produced from the gelcoat mixing area each month to ensure compliance with Condition D.1.2.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.143 Record Keeping Requirements

- (a) To document compliance with Condition D.1.2, the Permittee shall maintain records of the total number of gallons produced from the gelcoat mixing area each month.
- (b) **To document compliance with Condition D.1.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAPs emission limits established in Condition D.1.3.**
 - (1) **The amount and HAP content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used;**
 - (2) **The HAPs usage for each month;**
 - (3) **The calculations used to quantify HAPs emissions for each month, including all equations and assumptions. The Permittee shall calculate HAPs emissions using the US EPA Inventory Improvement Program Volume II: Chapter 8, Preferred and Alternative Methods for Estimating Air Emissions from Paint and Ink Manufacturing Facilities; and**
 - (4) **The weight of each HAP emitted for each compliance period.**
- (b) To document compliance with Condition D.1.97, the Permittee shall maintain records of daily visible emission notations of the gelcoat mixing area stack exhaust when the raw materials in the gelcoat mixing area that have potential particulate emissions are being dispensed into the process equipment.

- (c) To document compliance with Condition D.1.108, the Permittee shall maintain records as to when the baghouse controlling the gelcoat mixing area is in operation and shall document the following:
- (1) Daily records of the following operational parameters during normal operation when venting to the atmosphere:
 - (A) Inlet and outlet differential static pressure; and
 - (B) Cleaning cycle: frequency and differential pressure.
 - (2) Documentation of all response steps implemented, per event.
 - (3) Operation and preventive maintenance logs, including work purchases orders, shall be maintained.
 - (4) Quality Assurance/Quality Control (QA/QC) procedures.
 - (5) Operator standard operating procedures (SOP).
 - (6) Manufacturer's specifications or its equivalent.
 - (7) Equipment "troubleshooting" contingency plan.
 - (8) Documentation of the dates vents are redirected.

D.1.124 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.1.2 and **Condition D.1.3** shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Engineered Polymer Solutions d/b/a Valspar Coatings
Source Address: 28335 Clay Street, Elkhart, Indiana 46517
Mailing Address: 28335 Clay Street, Elkhart, Indiana 46517
Part 70 Permit No.: T 039-7428-00147
Facility: CF-1
Parameter: Worst case single HAP emissions
Limit: Less than 9.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

Month	Worst Case Single HAP (tons)	Worst Case Single HAP (tons)	Worst Case Single HAP (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Engineered Polymer Solutions d/b/a Valspar Coatings
Source Address: 28335 Clay Street, Elkhart, Indiana 46517
Mailing Address: 28335 Clay Street, Elkhart, Indiana 46517
Part 70 Permit No.: T 039-7428-00147
Facility: CF-1
Parameter: Total HAPs emissions
Limit: Less than 24.5 tons per twelve (12) consecutive month period, with compliance determined at the end of each month

YEAR: _____

Month	Total HAPs (tons)	Total HAPs (tons)	Total HAPs (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this month.

9 Deviation/s occurred in this month.

Deviation has been reported on: _____

Submitted by: _____

Title/Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Conclusion

This operation of this source shall be subject to the conditions of the attached proposed Part 70 Significant Permit Modification No.: **039-15899-00147**.